

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

Allan Chiocca,

Plaintiff

v.

Civ. A. No.: 1:19-cv-10482-WGY

**The Town of Rockland, Deirdre Hall,
Edward Kimball, Larry Ryan,
Michael Mullen Jr., Michael O'Loughlin,
Richard Penney, and Kara Nyman**

Defendants

PLAINTIFF ALLAN CHIOCCA'S MOTION FOR PARTIAL SUMMARY JUDGMENT

This is the Plaintiff Allan Chiocca's motion for partial summary judgment as to liability on count one (violation of Mass Gen. Laws c. 151, § 4(1) and 4(16A) – quid pro quo sexual harassment) and count 24 (breach of contract – suspension in violation of contract/Town Charter) of his Complaint. In support hereof, the Plaintiff submits the accompanying memorandum of law, statement of material facts, and declaration of Samantha C. Halem (and exhibits attached thereto).

Wherefore, the Plaintiff respectfully requests that his motion is **ALLOWED**.

Respectfully Submitted,
Plaintiff,
Allan Chiocca,

By his attorney(s),

/s/ Adam J. Shafran
Adam J. Shafran, Esq. (BBO 670460)
ashafran@rflawyers.com
Jonathon D. Friedmann, Esq. (BBO 180130)
jfriedmann@rflawyers.com
Rudolph Friedmann LLP
92 State Street
Boston, MA 02109
617-723-7700
617-227-0313 (fax)

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1

The undersigned counsel for the Plaintiff hereby certifies that on November 15, 2021 Plaintiff's counsel conferred with counsel for the Defendant Town of Rockland and attempted in good faith to resolve or narrow the issue presented in the Plaintiff's motion.

/s/ Adam J. Shafran
Adam J. Shafran

CERTIFICATE OF SERVICE

I, Adam J. Shafran, do hereby certify that this document filed through the ECF system shall be sent electronically to the registered participants as identified on the Notice of Electronic Filing on November 15, 2021

/s/ Adam J. Shafran
Adam J. Shafran